## IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

LESTER LEE, Plaintiff Pro Se

v.

Case No. 8:24-cv-01205-ABA

BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), RAMMY AZOULAY, and LAMONT SAVOY, Defendants.

## PLAINTIFF'S NOTICE TO THE COURT REGARDING LATE FILING OF MOTIONS

## **To the Honorable Court:**

I write with the utmost respect and humility to notify the Court that I was unable to submit certain motions by the deadline set forth in the Court's prior order. I sincerely apologize for this delay and wish to make clear that it is not due to any disrespect for the Court or its authority, but rather a result of the weight, complexity, and gravity of the issues I am raising.

The motions I am preparing—particularly the Motion to Disqualify Counsel and the requests for ethical referral—are not made lightly. These are not routine filings. They allege misconduct, conflicts of interest, and retaliatory abuse of power by defense counsel and affiliated parties. As I reviewed the underlying documents, communications, and evidence, I began to see a larger pattern unfold—one that compelled me to proceed with caution, deliberation, and absolute precision.

I am a disabled veteran who served two tours in Iraq. I did not choose to be disabled, nor did I take lightly the decision to seek the aid of service animals or to assert my rights under the Fair Housing Act and the Americans with Disabilities Act. Throughout this litigation and the events leading up to it, my dignity, my safety, and my very identity have been put on trial—not just in this Court, but in the court of public

opinion, where I have been unfairly targeted, surveilled, and slandered for simply asserting my legal rights.

I am pursuing these motions not out of vengeance, but out of necessity. I have lost a beloved service animal as a result of the conditions I was subjected to. I have been locked out, stalked, retaliated against, and made to feel that my existence is inconvenient to those in power. These experiences have not only affected my physical and emotional well-being, but have at times driven me to the edge of hopelessness.

And yet, I chose the lawful path. I chose to litigate, not retaliate. I chose to learn the rules, to understand the system, and to bring my claims before this honorable Court. That choice deserves the same respect as any licensed attorney's motion—and that is why I took the extra time to ensure my filings meet the standards of thoroughness and factual support required to substantiate such serious accusations.

I ask for the Court's understanding and a brief extension of time to finalize and submit the motions and their accompanying exhibits. They will be filed as soon as possible, and any additional supporting documents will follow shortly thereafter.

Thank you for your patience, and for the opportunity to be heard.

In service of God and my country,

Corporal Lester Lee

Retired, U.S. Army

Happy 250<sup>th</sup> Birthday

## **CERTIFICATE OF SERVICE**

I hereby certify that on this date, June 14, 2025, a true and correct copy of the foregoing Notice Regarding Late Filing of Motions was served by email only upon the following parties:

Anthony D. Dwyer Eckelson & Wolf, P.C. Email: adwyer@ewva.com

Henry T. Carkhuff Eckelson & Wolf, P.C.

Email: hcarkhuff@ewva.com

This document is also being filed with the Court via the EDSS system, which automatically serves notice of filing to all parties of record.

Yours in <del>sq</del>rvice,

Corporal Lester Lee Retired, U.S. Army

Happy 250th Birthday